

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Creation of a Low Power Radio Service)	MM Docket No. 99-25
)	
Amendment of Service and Eligibility Rules for FM Broadcast Translator Stations)	MB Docket No. 07-172
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To the Commission:

**Reply Comments of Nickolaus E. Leggett
To the Petition for Reconsideration of LifeTalk Radio, Inc.**

I am a certified electronics technician (ISCET and iNARTE) and an Extra Class amateur radio operator (call sign N3NL). I hold an FCC General Radiotelephone Operator License with a Ship Radar Endorsement. I am an inventor holding three U.S. Patents. My latest patent is a wireless bus for digital devices and computers (U.S. Patent # 6,771,935). I have a Master of Arts degree in Political Science from the Johns Hopkins University

I am one of the original petitioners for the establishment of the Low Power FM (LPFM) radio broadcasting service (RM-9208 July 7, 1997 subsequently included in MM Docket 99-25). I am also one of the petitioners in the docket to establish a low power radio service on the AM broadcast band (RM-11287). I have filed a total of over 200 formal comments with the FCC over the years since the 1970s. I have filed comments with other Federal agencies as well including the USPTO, FAA, FERC, EPA, and the TSA.

My Reply Comments

As one of the initial petitioners for Low Power FM (LPFM) radio broadcasting, I am opposed to the Petition for Reconsideration filed in this docket by LifeTalk Radio, Inc.

The basic concept of low power FM (LPFM) radio broadcasting is to provide a medium where local communities can create and broadcast their own radio programs. These programs include community bulletins, police notices, emergency warnings, local government meetings, services and sermons from local churches, high school sports events, local musicians, locally produced plays and poetry readings. The important thing to notice is that the focus is on local events not national events.

LPFM broadcasting was created to overcome the strong bias in high-power radio broadcasting towards nationally broadcast program content. Conventional radio broadcasting has no room for town meetings, Little League games, or Harold the local rapper. There are many radio channels with national centrally-produced content. There are very few radio channels that are available for locally-produced content.

The whole idea of LPFM is a small-scale operation designed for a very limited geographic area that contains an individual community or neighborhood. It is the opposite of nationally networked radio broadcasting. It is quite frankly a waste of spectrum to use these little LPFM stations for nationally transmitted content. Nationally transmitted content should be transmitted on large high-power stations. Indeed, audio streaming on the Internet is an excellent mode for national and international distribution of program content directly to listeners' home computers.

It is unlikely that subsidiaries of a large national organization are going to provide local programming more thoroughly and effectively than actual local organizations will provide. For this reason, and the comments stated above, LPFM broadcasting should be limited to local organizations that are located in the area served by the LPFM station.

In addition, if large organizations are allowed to displace real local organizations on the air, the legitimacy of the Federal Communications Commission and the Federal government will decline. This will lead to unpleasant and often hostile class-based politics. This is especially a problem when minority organizations are blocked from serving their own individual communities and neighborhoods.

Respectfully submitted,

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February 19, 2013

In compliance with FCC rules, I have sent a paper copy of these reply comments to LifeTalk Radio, Inc. at the address below:

**Donald E. Martin, P.C.
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